

Verified Correct Copy of Original 12/30/2016.

4TH DISTRICT CLERK  
16 DEC 29 PM 2:46  
FILED

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MULTNOMAH

**PROVIDENCE HEALTH &  
SERVICES-OREGON**, an Oregon  
nonprofit corporation, dba Providence  
Portland Medical Center,

Plaintiff,

vs.

**SANJANA PAHALAD MANCUSO**,  
personal representative of the Estate of  
Rattan Kumar Pahalad, in her official and  
personal capacities,

Defendant.

Case No. 16CV38474

**MOTION FOR CHANGE OF JUDGE**

Plaintiff moves the court for an order disqualifying the Honorable Jerome E.  
LaBarre from presiding over this case and assigning another judge to do so.

Counsel for the parties received electronic notification of Judge LaBarre's  
assignment as motions judge on December 28, 2016.

Plaintiff's counsel has conferred with defendant's counsel, Maret Thatcher Smith,  
and she does not oppose this motion. Plaintiff's counsel has hand delivered a copy of this  
motion and supporting affidavit to Judge LaBarre's chambers.

This motion is made pursuant to ORS 14.250 to 14.270 and is supported by the  
attached affidavit of counsel.

Verified Correct Copy of Original 12/30/2016.

1 DATED this 29th day of December, 2016.

2 HARRANG LONG GARY RUDNICK P.C.

3 By: Susan Marmaduke  
4 Susan D. Marmaduke, OSB 841458  
5 susan.marmaduke@harrang.com  
6 Arden J. Olson, OSB 870704  
7 arden.j.olson@harrang.com  
8 Lorelei Craig, OSB 152515  
9 lorelei.craig@harrang.com  
10 Telephone: 541-485-0220  
11 Facsimile: 541-686-6564  
12 Of Attorneys for Plaintiff

13 Trial Attorney: Arden J. Olson  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

HARRANG LONG GARY  
RUDNICK P.C.  
60 East 10th Avenue  
Suite 300  
Astoria, OR 97103-3273  
Phone 541-485-0220  
Fax 541-686-6564

Page 2 – MOTION FOR CHANGE OF JUDGE

1 **CERTIFICATE OF SERVICE**

2 I certify that on December 29, 2016, I served or caused to be served a true and  
3 complete copy of the foregoing **MOTION FOR CHANGE OF JUDGE** on the party or  
4 parties listed below as follows:

- 5 ☐ Via the Court's Efiling System  
6 ☒ Via First Class Mail, Postage Prepaid  
7 ☒ Via Email  
8 ☐ Via Personal Delivery

9 **Maret Thatcher Smith**  
10 [maret@thatchersmithlaw.com](mailto:maret@thatchersmithlaw.com)  
11 Thatcher Smith Law  
107 SE Washington St. Ste 255  
Portland, OR 97214

12 Of Attorneys for Defendant

13 I further certify that on December 29, 2016, I caused a true and correct copy of  
14 this proposed **MOTION FOR CHANGE OF JUDGE** to be served by hand delivery to  
15 The Honorable Jerome LaBarre's chambers.

16 HARRANG LONG GARY RUDNICK P.C.

17  
18 By: *Susan Marmaduke*  
19 Susan D. Marmaduke, OSB 841458  
20 [susan.marmaduke@harrang.com](mailto:susan.marmaduke@harrang.com)  
21 Telephone: 541-485-0220  
22 Facsimile: 541-686-6564  
23 Of Attorneys for Plaintiff

24 00872651.v1